

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Federal Trade Commission,

Plaintiff,

v.

GTCR BC Holdings, LLC, et al.,

Defendants.

Hon. Jeffrey I. Cummings

Case No. 1:25-cv-02391

**MOTION OF NON-PARTY ENDOVASCULAR ENGINEERING  
FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Endovascular Engineering, Inc. (“Endo”), respectfully moves pursuant Local Rules 5.8 and 26.2 for leave to file the following document under seal:

- (a) Exhibit A to the Unopposed Motion of Non-Party Endovascular Engineering for *In Camera* Treatment of Certain Proposed Evidence (the “Motion”).

In support of this request, Endo states:

1. The document listed above is being filed concurrently with the present motion.
2. The document listed above references confidential business and contractual matters that constitute Competitively Sensitive Information produced by non-party Endo in response to Defendants’ subpoena. Endo designated the document listed above as Confidential Material pursuant the Confidentiality Order (ECF 61) entered in this case.
3. Disclosure of Endo’s Competitively Sensitive Information would almost certainly put Endo at a disadvantage in the highly competitive medical technology marketplace in which it operates.

4. To comply with the confidentiality obligations under relevant contracts between Endo and its vendors, and in the interest of justice as a non-party to this litigation, Endo is requesting that the Court permit Endo to file under seal the Competitively Sensitive Information and Confidential Material that Endo produced in response to a third party subpoena.
5. Endo is also filing a public and redacted version of Exhibit A to its Motion. The public version of Exhibit A redacts the confidential portions from this document. This redacted version will remain on the docket to ensure public access to the non-confidential portions of Endo's produced document.
6. Neither Plaintiff nor Defendants oppose Endo's Motion.

WHEREFORE, Endo requests that this Court grant its Motion and enter an order giving Endo leave to file under seal Exhibit A to Endo's Motion for *In Camera* Treatment of Certain Proposed Evidence.

Dated: August 13, 2025

/s/ Pamela Begaj Loutos

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**CERTIFICATE OF SERVICE**

I, Pamela Begaj Loutos, hereby certify that on August 13, 2025, I electronically filed the foregoing ***Motion for Leave to File Documents under Seal***, using the ECF system for the United States District Court for the Northern District of Illinois. Notice of this filing will be sent by operation of the Court's electronic filing system to all counsel of record.

/s/ Pamela Begaj Loutos

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